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November 21, 2020

HON. VERNON S. BRODERICK  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *United States v. Carlton Vanier*  
Docket # 18 Cr 873

Your Honor:

We are respectfully requesting a 60-day extension of time to file our post-verdict motion on behalf of the defendant, to January 26, 2021. We make this request given an unexpected delay in obtaining what we believe to be potential *Brady* materials in this case. Based on my office's phone conversation with the government last week, we do not expect their opposition to this request.

On or about October 29, 2020, my office filed a proper medical records request with Samaritan Village based on very specific instructions provided to us by their records management department. Prior to our appearance in this matter, the records department was highly communicative with my office. Samaritan Village has unexpectedly gone silent. Neither counsel for the organization nor their records personnel has returned our calls or messages, and as of Friday, last week, the organization appeared to be closed due to the COVID-19 resurgence.

Our initial communications with Samaritan Village had led us to believe that our request was neither unusual nor burdensome. We still believe that this is the case. Given the potential gravity of the medical records, combined with the urgency of this matter, we are requesting that the Court sign the enclosed subpoena seeking our client's relevant medical records.

Respectfully submitted,



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All parties *via ECF*

Counsel's request for extension to file post verdict motion on January 26, 2021 is Granted. Government's response due February 2, 2021. The motion hearing scheduled for January 29, 2021 is adjourned. Counsel's Application for a Subpoena to obtain medical records is Denied. The parties shall appear for a telephone conference on December 15, 2020 at 11:00 a.m. The dial in number for the conference is 888-363-4749, Access Code 2682448. Counsel shall notify the court by the close of business on December 11, 2020 if the defendant will waive his appearance.

SO ORDERED:

  
HON. VERNON S. BRODERICK 12/10/2020  
UNITED STATES DISTRICT JUDGE